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July 8, 1997

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JUL - 8 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Attention: Policy and Rules Division  
Stop Code 1800D

Re: MM Docket Nos. 91-221, 87-8, 94-150, 92-51 and 87-154  
Television Station WOAC(TV), Canton, Ohio

Dear Sir or Madam:

On behalf of Whitehead Media of Ohio, Inc., licensee of Television Station WOAC(TV), Canton, Ohio, we submit herewith an original and four copies of the licensee's response to the FCC's June 17, 1997 *Public Notice* in the above-captioned proceedings. This submission concerns a Time Brokerage Agreement between Paxson Communications of Cleveland-67, Inc. and Whitehead Media of Ohio, Inc., the licensee of Television Station WOAC(TV), Canton, Ohio.

Should any questions arise concerning this matter, kindly contact the undersigned.

Very truly yours,

John R. Feore, Jr.

JRF/lkr  
Enclosure

No. of Copies rec'd 0+4  
List ABCDE

# LMA REPLY FORM

MARKET: CLEVELAND, OHIO

DMA #: 13

					Degree of Overlap (%)	Nielsen (all day) Audience Share (9am - midnight)
	Channel No. & <u>Call Sign</u>	Network <u>Affiliation</u>	Licensed <u>Community</u>	Owner/ <u>Licensee</u>	City    Grade    Grade <u>Grade</u> A    B	<u>11/96</u> <u>2/97</u> <u>5/97</u>
Brokered Station	Channel 67 WOAC(TV)	Independent	Canton, OH	Whitehead Media of Ohio, Inc.	City Grade A and Grade B overlap (Engineering Supplement to be provided)	Not Available
Brokering Station:	WAKC	Independent	Akron, OH	Paxson Communica- tions of Cleveland-67, Inc.		Not Available

LMA Specifics:	Date of LMA <u>Signing</u>	Length of <u>Initial Term</u>	Initial Term <u>Start Date</u>	Initial Term <u>End Date</u>	<u>Renewal Provisions/Terms</u> Describe renewal provisions including: (1) length of renewal, (2) at which party's option, (3) whether renewal is automatic, and (4) how renewal option may be exercised.	% Time Brokered <u>per week</u>
	10/30/95	10 years	10/30/95	10/30/05	Mutually agreed upon term	Up to 96.4% (168 hours/ week)

**PUBLIC INTEREST BENEFITS RESULTING FROM ENTERING INTO THE LMA**

The Time Brokerage Agreement for WOAC(TV), Canton, Ohio, was entered into together with funding provided by Paxson Communications of Cleveland-67, Inc. which enabled Whitehead Media, a company wholly-owned by an African American, to acquire WOAC. The TBA has been combined with the co-location of the stations in new facilities to create cost efficiencies in each station's operation. Without the TBA and the ability to provide programming over the station, Paxson Communications would not have been willing to provide the funding to allow Whitehead Media, Inc. to acquire the station.